Routes to Settlement

Call for evidence to the Home Affairs Committee

Submission by the **No Recourse North East** (NRNE) Partnership

December 2025

Who we are and why our evidence matters.

No Recourse North East (NRNE) is a partnership of over 30 organisations across Northeast Scotland, including local authorities, charities, and grassroots groups, all united in supporting individuals and families with No Recourse to Public Funds (NRPF). The partnership is facilitated by three organisations, each uniquely poised to provide specialist information and excellent support: Grampian Regional Equality Council (GREC), Shelter Scotland and Turning Point Scotland. Based primarily in Aberdeen and Aberdeenshire, we provide signposting and advice to/for migrants facing destitution and share best practice with the services set up to support them through specialist training and support.

Our evidence is built on two fronts: the professional expertise of our members, many whom manage the support systems detailed in this submission, and the indispensable lived experience of migrants navigating the UK's immigration system, who form our Lived Experience Group. We offer in this inquiry a unique perspective from a region with distinct cultural, demographic, and economic quirks, detailing how the proposal to extend the route to settlement by 10 years would systematically deepen destitution, entrench exploitation, and actively hinder the integration and community cohesion it purports to encourage.

Executive Summary

Based on the evidence from No Recourse North East, this submission strongly opposes the proposal to extend the settlement route to ten years. This policy would systematically deepen destitution and extreme hardship for migrant households by prolonging the No Recourse to Public Funds (NRPF) condition and imposing unaffordable costs. It would take a profound toll on physical and mental health, entrench employment precarity and exploitation, and actively hinder integration and social cohesion. The proposal would also overwhelm already strained local authorities and employers with increased administrative burdens and support costs. Crucially, it disregards a coherent body of evidence from parliamentary committees, academia, and the third sector that advocates shorter, more secure routes to settlement. For the sake of community cohesion, economic prosperity, and basic human dignity, this damaging proposal must be either reconsidered or ideally thrown out.

1) Potential Impacts of Changes to Pathways to Settlement

A) Pathways to Settlement Effects on Immigration and Settlement

Research is limited on how settlement pathways influence broader immigration and settlement rates. Nevertheless, a 2025 Glasgow University publication on migration drivers, specifically climate change, concluded that the architecture and length of routes are of relatively minor importance to migrants

"Contrary again to some public narratives, migration intentions have relatively short-term motivations and are not strongly driven by the desire of settling quickly for the long run."[1]

The Arab Gulf states serve as a key benchmark. They demonstrate that restrictive residence/settlement policies do not necessarily dampen immigration rates. Summarising the available data in 2023, the International Labour Organization (ILO) concluded that "Arab States" had by far the largest share of migrant workers as a proportion of workers in the world: 41.4%.[2] This conclusion remains when the sample is expanded to encompass all persons legally residing in a sovereign state, where Arab States remain outliers, hosting more migrants as a share of their total population than almost any other.

This is despite their exclusive and rigid pathways to settlement, which require, for example, continuous residency for up to 30 years (unbroken for no longer than two months), mandated religious practice, or in Saudi Arabia's case, nothing short of marriage to a citizen.[3]

B) Impacts on Migrant Households

Deepening Destitution and Extreme Hardship

Extending the settlement pathway from five to ten years would prolong and intensify destitution for thousands of migrant households. The existing ten-year route provides a grim preview: over half of those on this route struggle to afford bills and food, and almost half are forced into debt to pay visa fees.[4]

This results directly from No Recourse to Public Funds (NRPF), a condition imposed on many visa-types which bars migrants from accessing a substantial amount of the state's welfare architecture and has

[1] Bayer, P., Ozturk, A. and Pardos-Prado, S., 2025. *Climate Risks and Migration Intentions*. [working paper]. University of Glasgow. Available at: https://osf.io/preprints/osf/3wyhc (Accessed: 21 November 2025).
[2] International Labour Organization, 2023. *Assessment of Labour Migration Statistics in the Arab States: Regional Report*. Geneva: International Labour Office. Available at: https://www.ilo.org/sites/default/files/2024-07/iloROAS-labour-migration%20report-March2024-web.pdf (Accessed: 21 November 2025).
[3] World Population Review, 2025. *Hardest Countries to Immigrate To 2025*. Available at: https://worldpopulationreview.com/country-rankings/hardest-countries-to-immigrate-to (Accessed: 21 November 2025).
[4] Mort, L., Whitaker-Yilmaz, J., Morris, M. and Shah, A. (2023) 'A punishing process': Experiences of people on the 10-year route to settlement*. London: IPPR, GMIAU and Praxis. Available at: http://www.ippr.org/research/publications/a-punishing-process (Accessed: 21 November 2025).

been described as a policy that imposes "destitution by design".[5] This is well documented by academic and third-sector research; For example, individuals supported by Fair Way Scotland report average weekly incomes of £40; two-thirds forego meals, and a majority have slept rough in the past year.[6] This proposal, which combines prolonged NRPF and eye-watering immigration process fees, creates what Labour MP Tahir Ali described as a:

"Perfect storm whereby families face never-ending cycles of destitution, homelessness and uncertainty."[7]

Consequently, migrants are forced to seek state and third-sector support. These systems, while providing invaluable assistance, are already overwhelmed by a growing, largely avoidable demand; set to explode should proposals become policy. The Aberdeen City Council in 2024 in their NRPF inquiry found that food insecurity is "evident amongst those who have NRPF", with just a single local foodbank, CFINE, providing upwards of 200 parcels a month.[8]

Speaking with a member of a partner organisation that provides social work for adults, the immediate reaction to the proposals vis-a-vis the reality on the ground was simple

"a prolonged period like that would only cause further hardship, I don't know what more else to say."[9]

Speaking with staff at a local charity that supports families with children under-5s, the pride in their ability to support those in need, often migrants with NRPF, was clear.

"We hold them above water, and up to now the Home Office has never sunk them, and we've always been proud of that."[10]

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[5] Watts-Cobbe, B., McMordie, L., Bramley, G., Sims, R., Young, G. and Rayment, M., 2024. *Destitution by design: righting the wrongs of UK immigration policy in Scotland*. York: Joseph Rowntree Foundation. Available at: https://www.jrf.org.uk/sites/default/files/pdfs/destitution-by-design-righting-the-wrongs-of-uk-immigration-policy-in-scotland-5f1e0cea127d6b70c7f0ead7a444d8da.pdf (Accessed: 21 November 2025).

[6] Ang, J. (2025) Ending Destitution in Scotland – A Road Map for Policymakers. Lawmanity. Available at: https://homelessnetwork.scot/wp-content/uploads/2025/02/Fair-Way-Legal-Briefing-12.2.25.pdf (Accessed: 21 November 2025).

[7] UK Parliament (2025a) House of Commons debates, 11 June. Available from: https://hansard.parliament.uk/commons/2025-06-11/debates/60505972-9340-4E8C-8F3E-F0A7A9350B9C/ChildPovertyAndNoRecourseToPublicFunds (Accessed: 21 November 2025).

[8] Aberdeen City Council (2024) No Recourse to Public Funds. CORS/24/289. Available at: https://www.aberdeencity.gov.uk/services/council-and-democracy/committees-meetings-minutes (Accessed: 24 November 2024).

[9] No Recourse North East Partnership, 2025d. Interview with a member of Aberdeen City Council Adult Protection Team, titled "Gathering evidence from ADT at ACC". Interviewed by No Recourse North East Partnership, 20 November.

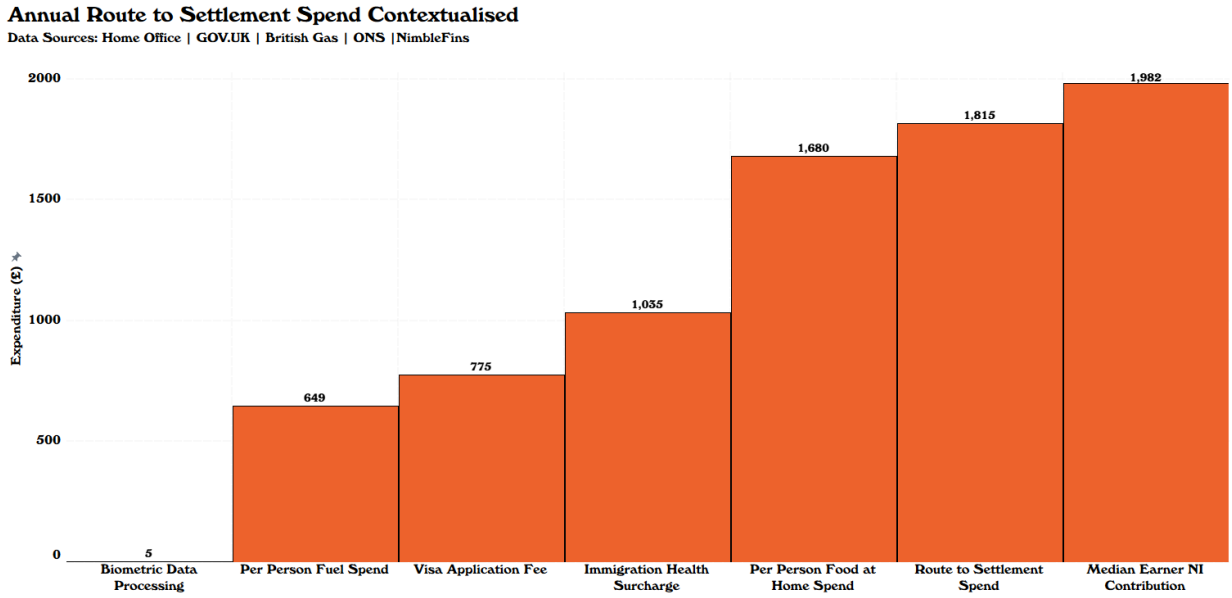
[10] No Recourse North East, 2025a. Interview with a member of Home-Start Aberdeen, titled "Gathering evidence from Home-Start". [Interview] Aberdeen, 13 November.

We fear these proposals would sink migrant households seeking stability, with potential to drag others with them. The financial pressure is already acute: nearly half of surveyed households on the ten-year route have let a family member's visa lapse due to cost, forcing them into irregular, vulnerable status.[11] This fear is concrete, as expressed by a member of our Lived Experience Group:

"I'm really afraid that mine and my friends' families are going to get separated due to ridiculous rules on immigration."[12]

For a political community that largely presents an unshakeable hardline against illegal migration, proposing policy that will push people into undocumented status is self-defeating.

The scale of these fees is stark. For instance, a skilled worker on a ten-year route pays roughly £1,800 annually, comparable to the annual National Insurance paid by a median UK earner (£37.4k) and exceeding the average individual's combined fuel and grocery costs as visualised below.[13;14;15;16;17]



[11] Praxis & Greater Manchester Immigration Aid Unit, 2025. *Proposed changes to settlement and citizenship pathways*, October 2025. (Accessed: 21 November 2025).
[12] No Recourse North East Partnership, 2025b. Focus group: Gathering evidence from the Lived Experience Group. Hosted by the No Recourse North East Partnership, 21 November 2025.
[13] NimbleFins (2024) Average Cost of Food Per Month in the UK. Available at: https://www.nimblefins.co.uk/average-uk-household-cost-food (Accessed: 24 November 2025).
[14] British Gas, 2024. *What's the average energy bill in the UK?* Available at: https://www.britishgas.co.uk/energy/guides/average-bill.html (Accessed: 24 November 2025).
[15] GOV.UK, 2024a. Skilled Worker visa: How much it costs. Available at: https://www.gov.uk/skilled-worker-visa/how-much-it-costs (Accessed: 24 November 2025).

[16] GOV.UK, 2024b. Estimate your income tax for the current year. Available at: https://www.gov.uk/estimate-income-tax (Accessed: 24 November 2025).

[17] Office for National Statistics, 2024. *Annual Survey of Hours and Earnings: 2024*. Available at: https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/annualsurveyofhoursandearnings/2024 (Accessed: 24 November 2025).

This figure excludes legal fees, which, though variable, often reach thousands of pounds. These costs are especially prohibitive in England, where legal aid is inaccessible for most immigration matters.[18]

Although Scottish law guarantees access, migrants in Northeast Scotland are effectively barred; the region is an "advice desert," without a single legal aid immigration solicitor.[19]

Sameera, a mother of three in our Lived Experience Group, summarised the financial precarity even in dual-income, professional households

"We are hardly left with close to £1000 pounds… and we have to consciously keep that aside every single month for IHS fees… £30,000 was taking my sleep away, but £60,000 pounds, I don't know how it is going to be paid."[20]

"Sometimes it feels like you are walking on eggshells… one funeral, one illness, and the whole plan for ten years collapses."[21]

Another member testified to the personal cost, detailing the sacrifices required to fund her settlement.

"A deposit for a property has gone away just for the right to live with my husband."[22]

Extending this ten-year path to all settlement migrants would dramatically expand the number of households experiencing severe material deprivation.

The Home Office's immigration operations generated over £2.2 billion in income with an operating margin exceeding 200% (National Audit Office, 2025); a scale that becomes staggering in context.[23] The Home Office's fee income surpasses that of all but 23 UK-based companies, including Tesco and Rolls-Royce; see visualisation on the next page. Its operating margin also exceeds that of any publicly listed company globally.[24]

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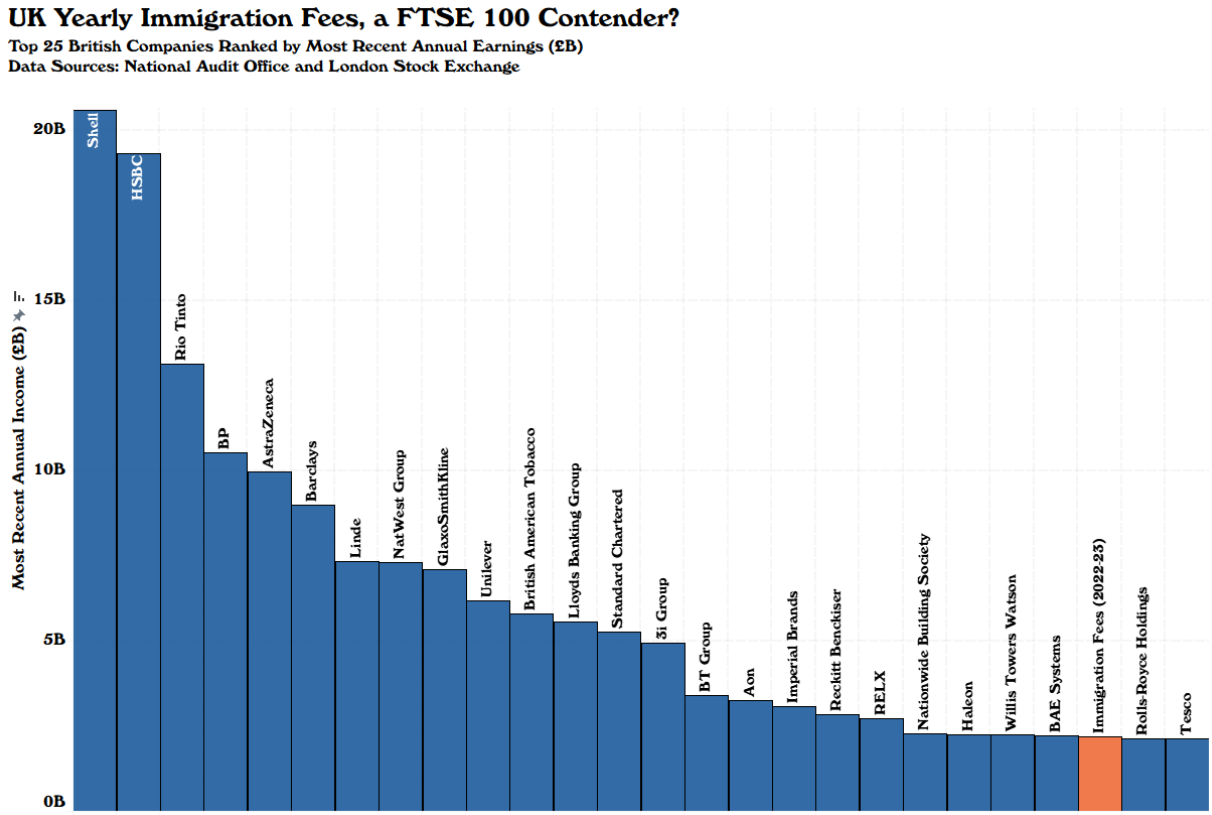
[18] NRPF Network (2025) *Legal aid*. Available at: https://nrpfnetwork.org.uk/information-and-resources/rights-and-entitlements/legal-aid (Accessed: 25 November 2025).
[19] Aberdeen City Council (2024) No Recourse to Public Funds. CORS/24/289. Available at: https://www.aberdeencity.gov.uk/services/council-and-democracy/committees-meetings-minutes (Accessed: 24 November 2024).
[20] No Recourse North East Partnership (2025b)
[21] Ibid.
[22] Ibid.
[23] National Audit Office, 2025. *Immigration: Skilled Worker visas*. HC 745. London: National Audit Office. Available at: https://www.nao.org.uk/wp-content/uploads/2025/03/Immigration-Skilled-Worker-visas.pdf (Accessed: 24 November 2025).
[24] Companies Market Cap (2025) Most profitable companies in the United Kingdom. Available at: https://companiesmarketcap.com/gbp/united-kingdom/most-profitable-companies-in-the-united-kingdom/ (Accessed: 25 November 2025).



This contrasts sharply with nations like the Netherlands, where law requires fees to reflect only administrative costs, not generate a profit.[25] More broadly, application fees in France, Spain, Portugal, and Germany average 10% of UK equivalents, with total settlement route costs roughly 5% .[26]

A Profound Toll on Physical and Mental Health

The severe stress and health deterioration inherent in a prolonged settlement route are well-documented and impact entire families. Research on the current ten-year route confirms that the process directly causes anxiety, depression, and stress, manifesting physically as insomnia, high blood pressure, and fatigue.[27]

The relentless fear and profound financial strain of the immigration process are so severe that it can drive individuals to suicidal ideation, as one individual told the JWCI:

"Death was better than being sent back, you have to understand, that was real desperation."[28]

[25] House of Lords Justice and Home Affairs Committee (2023) All families matter: An inquiry into family migration. 1st Report of Session 2022–23, HL Paper 144. London: Authority of the House of Lords. (Accessed: 21 November 2025).
[26] Joint Council for the Welfare of Immigrants (2021) We are here: Routes to regularisation for the UK's undocumented population. London: Joint Council for the Welfare of Immigrants. Available at: https://jcwi.org.uk/wp-content/uploads/2024/07/JCWI-We-Are-Here-2021-A4-web-ready-1.pdf (Accessed: 24 November 2025).
[27] Migrant Voice (2022) Destroying Hopes, Dreams and Lives: How the UK visa costs and process impact migrants' lives. London: Migrant Voice.
[28] Ibid.

A member of our own lived experience group, who will remain unnamed to protect her identity, shared feelings of stress and saturation during the immigration process, which she was forced to face whilst simultaneously fighting for justice against her abuser and raising her young daughter. The process affected her mental health to the point of daily migraines and panic attacks:

"Morning, I was panicking, getting migraine attacks... every night goes like dreaming of what will happen tomorrow – maybe the Home Office send a letter... maybe they stop paying the accommodation and I have to leave."[29]

Commenting on the proposals' likely impact, a member of a partner organisation that supports victims of domestic abuse team was sceptical, warning it could deter abuse survivors from seeking support.

"I would have concerns about what the impact would [be] on our clients . . . it could potentially stop . . . certainly from my expertise in terms of victims of mass abuse, it's already hard enough for them to leave."[30]

Recent local data confirm this: among Fair Way Scotland's NRPF clients, nearly half scored low for mental well-being, over twice the general population's rate, with those scoring 'very low' four times more prevalent.[31] Doubling the insecure period would prolong suffering for current migrants and guarantee severe health risks for a much larger population, further straining already overstretched emergency health services.[32]

Altering the terms of the settlement 'contract' mid-process, without warning, would aggravate the anguish of families and individuals. Those who have planned for a five-year process face a broken promise and a doubled burden. A group member highlighted this absurdity by analogy:

"If your landlord changed your contract halfway through, you could go to court. Here, we've followed every rule, and still, they can double the time and cost with no recourse. It feels like being punished for doing the right thing."[33]

Entrenching Precarious Employment and Exploitation

A universal ten-year route could severely undermine migrants' employment rights and economic mobility. While temporary, employer-sponsored visas are not inherently problematic, extending this

[29] No Recourse North East Partnership, 2025b.
[30] No Recourse North East Partnership (2025c) interview with a member of Aberdeen City Council Domestic Abuse Team, titled "Gathering evidence from DAT at ACC".. Interviewed by No Recourse North East Partnership, 20 November.
[31] Ang, 2025
[32] Ibid.
[33] No Recourse North East Partnership, 2025b

dependency for 10 years "ties them to their employer for longer," significantly increasing the risk of exploitation and career stagnation.[34]

A September 2025 parliamentary debate warned a longer route could "embolden bad employers," exacerbating the vulnerability of the at least 40,000 care workers already in limbo due to exploitation and sponsorship pressures.[35]

Data from the ten-year route show that nearly one in four migrants report their immigration status hindering job retention or acquisition. At the same time, 7% were forced into unwanted work, and 6% worked in dangerous conditions.[36]

NRPF itself can be the main barrier for people from working by blocking access to childcare support, trapping them in a cycle of low income and dependency.[37] By denying the stability of settlement for ten years, this policy systematically suppresses wages and job mobility for a significant portion of the workforce.

A Crisis of Deskilling and Wasted Potential

Prolonged temporary status actively deskills the UK's migrant workforce, trapping professionals in roles beneath their qualifications and preventing full economic contribution.

This deskilling is acute in the care sector, where migrant workers are typically overqualified. The Migration Observatory warns that a longer settlement path increases "the risk that they move out of the sector when they have the freedom to do so", revealing a system that exploits temporary status to undermine long-term skill retention.[38]

Extending this period to ten years would block a much larger cohort of skilled workers, including those on the current five-year route, from transitioning to matched roles or accessing further training. A single mother with NRPF in our Lived Experience Group, who holds both a bachelor's and a master's degree, explained how being locked out of state childcare after age four prices her out of career progression:

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[34] Cuibus, M. (2025) Changes to settlement: what do they mean?. Oxford: Migration Observatory, University of Oxford. Available at: https://migrationobservatory.ox.ac.uk/resources/commentaries/changes-to-settlement-what-do-they-mean/ (Accessed: 24 November 2025).

[35] UK Parliament (2025b) House of Commons debate on Indefinite Leave to Remain. Hansard, 8 September. Available at: https://hansard.parliament.uk/commons/2025-09-08/debates/25EC2767-BBFF-4FE8-8F52-65B2C28CED10/IndefiniteLeaveToRemain (Accessed: 24 November 20

[36] Mort et al., 2023.

[37] Benton, E., Karlsson, J., Pinter, I., Provan, B., Scanlon, K. and Whitehead, C. (2021). Social Cost Benefit Analysis of the no recourse to public funds (NRPF) policy in London. London: LSE London. Available at: https://www.lse.ac.uk/geography-and-environment/research/lse-london/documents/Reports/Social-Cost-Benefit-Analysis-of-the-NRPF-policy-in-London.pdf (Accessed: 21 November 2025).

[38] Cuibus, 2025

“Sometimes I really want to learn new skills… but childcare stops me. I can’t apply for any funding here to get childcare and go out to learn”.[39]

This constitutes a significant loss of human capital and contradicts the stated aim of attracting 'global talent,' especially given the UK's OECD ranking outside the top five hubs for global talent.[40;41]

Actively Hindering Integration and Social Cohesion

universal ten-year pathway is a direct barrier to integration, fostering a sense of permanent temporariness that breeds indifference and exacerbates all risks presented thus far. This status insecurity directly undermines belonging: one-third of those on the existing ten-year route fee.[42] This proposal extends an architecture accused of:

“[treating] almost all migrants as visitors who do not belong here," which is "illogical, and runs counter to the professed values of a country where anybody who fulfils the criteria can belong.”[43]

Research from Switzerland and the Netherlands, countries of similar financial standing and relative immigrant populations, supports the hypothesis that secure residence status is a prerequisite for social integration across multiple migration populations and need not be its culmination.[44,45]

By delaying access to settlement's security and rights, like job mobility, essential support, and political participation, the proposal prevents migrants from putting down roots, building social ties, and fully investing in UK life, ultimately damaging community cohesion. This financial pressure disenfranchises migrants, forcing them into excessive work hours to maintain legal status and forfeiting community engagement. Local charities echoed this sentiment:

“I've found families where the mum goes out during the night to work and stays up all day with her children, and it's just not sustainable.”[46]

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[39] No Recourse North East Partnership, 2025b
[40] OECD (2019) Measuring and assessing talent attractiveness in OECD countries. OECD Social, Employment and Migration Working Papers, No. 229. Paris: OECD Publishing. Available at: https://www.oecd.org/content/dam/oecd/en/publications/reports/2019/05/measuring-and-assessing-talent-attractiveness-in-oecd-countries_18c7ed48/b4e677ca-en.pdf (Accessed: 21 November 2025).
[41] OECD (2023) Migration Policy Debates: What is the best country for global talents in the OECD? No. 29, March 2023. Paris: OECD Publishing. Available at: https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/03/what-is-the-best-country-for-global-talents-in-the-oecd_3496c15f/5186ab2d-en.pdf (Accessed: 21 November 2025).
[42] Praxis & GMIAU, 2025.
[43] JCWI, 2021.
[44] Bakker, L., Dagevos, J. and Engbersen, G. (2014) 'The Importance of Resources and Security in the Socio-Economic Integration of Refugees. A Study on the Impact of Length of Stay in Asylum Accommodation and Residence Status on Socio-Economic Integration for the Four Largest Refugee Groups in the Netherlands', International Migration & Integration, 15, pp. 431–448. https://doi.org/10.1007/s12134-013-0296-2 (Accessed: 24 November 2025).
[45] Hainmueller, J., Hangartner, D. and Pietrantugno, G. (2017) ‘Catalyst or Crown: Does Naturalization Promote the Long-Term Social Integration of Immigrants?’, American Political Science Review, 111(2), pp. 256–276. doi:10.1017/S0003055416000745 (Accessed: 24 November 2025).
[46] No Recourse North East, 2025a

Furthermore, given the intersectional nature of the issue at hand, phenomena already presented, such as poor health, underemployment, and an inability to find, for example, childcare, are clear barriers to integration.

C) Impacts to Business and Employers

A System Unfit for Novel Demands

Prolonged routes and stricter settlement requirements will impair employers' ability to retain and recruit staff, forcing them to rethink long-term workforce planning. Undermining the five-year route reduces certainty, a point firmly established by evidence. The Justice and Home Affairs Committee's 2023 "All Families Matter" inquiry documented this repeatedly:

"[visa rules lead to] an exodus of highly skilled workforce that our health system and wider society is in desperate need of".[47]

"The health service at this moment is desperately short of staff, doctors and nurses. … I know so many colleagues who have left the country because they were not able to bring their parents here and were not able to carry out their duties as a son or a daughter".[48]

Complex, prolonged routes will deter global talent, redirecting them to more hospitable nations, a loss the UK cannot afford. OECD rankings already place the UK outside the top five destinations for global talent, lagging behind peers like the USA and Germany.[49;50]

We also expect that longer paths to settlement will increase the administrative burden on HR departments of sponsoring employers and, where they don't exist, untrained employees. The 10-year route almost guarantees a higher likelihood of missed renewals, shifting personal circumstances, and gaps in permission. Therefore, an employee's eligibility so stay in the UK will depend not only on their own conduct, but on their superiors' ability to manage, process, and respond to an influx of immigration-queries, which they may be untrained to do or understaffed to handle.

Overwhelmed Local Authorities

Similarly, applying new rules to both current applicants and new arrivals would overwhelm an already failing system. Our Lived Experience Group and others consistently report systemic processing deficiencies and severe, routine delays.[51]

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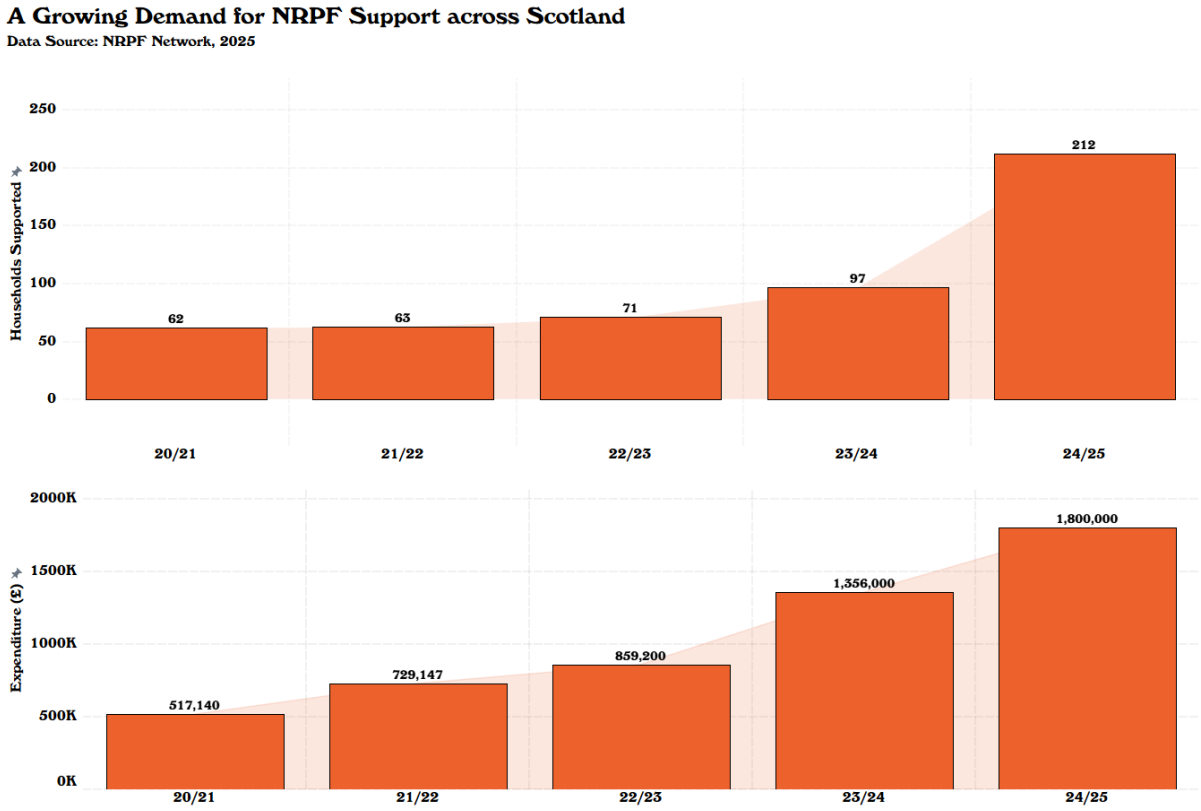
[47] House of Lords JHA Committee, 2023.
[48] Ibid.
[49] OECD, 2019
[50] OECD, 2023
[51] We Belong, JCWI, Refugee & Migrant Centre, and RAMFEL (2023) Shorter routes to settlement: How reducing the time to citizenship for migrants will benefit everyone. London: We Belong. Available at:

The avalanche of applications and subsequent re-applications that will accompany these proposals, is likely to be less the straw and more the bale that broke the camel's back. Consequently, the Independent Chief Inspector of Borders and Immigration called for a review of the ten-year route in 2023. A call that has since been sidelined or ignored by proponents of this extension.[52] These proposals ignore on-the-ground realities. Demand for NRPF support has surged across the UK; NRPF Network data shows that expenditure and caseloads have tripled in five years, see visualisation below. Local authorities bear these costs without dedicated funding.



COMPAS and COSLA value this data but call it "only the tip of the iceberg," noting that data gaps and uncertainty around migrant entitlements mean the actual need is far greater.[53]

While we welcome local authority investment in NRPF support, chronic underfunding persists. Extending the settlement route would accelerate demand for services and staff that are already, as the APPG on Migration and APPG on Poverty noted in 2024, operating with support levels below mainstream

https://static1.squarespace.com/static/5d91f87725049149378fce82/t/651e8f4a46f77150281b9e0f/1696501578500/Joint+briefing+shorter+routes+to+settlement_September+2023.pdf (Accessed: 21 November 2025).

[52] Praxis & GMIAU, 2025

[53] COMPAS & COSLA, 2025a. *Understanding Migrant Destitution in Scotland*. [pdf] Centre on Migration, Policy and Society (COMPAS), University of Oxford. Available at: https://www.compas.ox.ac.uk/wp-content/uploads/2025-Understanding-Migrant-Destitution-in-Scotland-2.pdf (Accessed: 21 November 2025).

benefits and under severe budgetary constraints. COMPAS and COSLA concluded that these services are

"Already operating on overstretched social care budgets and often lack the training, infrastructure or investment to meet the need and to provide adequate support that meets people's needs."[54]

A prolonged route guarantees increased NRPF-related expenditure, exposing the condition's "money-saving logic" as a misnomer. In a stark irony, as this inquiry opened, Scotland's local authorities wrote to the Chancellor warning of a "£497.5m funding gap in 2025/26".[55] This shortfall contrasts sharply with evidence that repealing NRPF could generate substantial savings. LSE research calculates a net benefit of £872m over a decade in London alone (benefit-cost ratio: 1.5), showing such a move would bolster local budgets.[56]

D) Putting it Together

In summary, the ten-year extension proposal flagrantly dismisses established, cross-spectrum evidence and violates nearly every key recommendation for a fair system, including:

- **The House of Lords Justice and Home Affairs Committee's** core recommendation to cap all settlement routes at five years and to reduce visa fees.
- **The APPG on Migration and APPG on Poverty's** call to reduce visa fees, the burden of immigration costs and fund local authorities to support those with NRPF
- **LSE's** definitive cost-benefit analysis proposing that lifting NRPF for families yields a net economic and social benefit.
- **The NRPF Partnership**, **COMPAS**, **Praxis, GMIAU and COSLA's** repeated demands to remove NRPF conditions from families, especially after five years of residence.
- **The Independent Chief Inspector of Borders and Immigration's (ICIBI)** call for a review of the damaging ten-year route, with the view for "setting shorter timescales"
- **The Scottish Government** and **COSLA's** joint strategy, Ending Destitution Together, which aims to ensure no one is forced into destitution.
- **The Scottish Government's** vision for ending homelessness
- **The Joseph Rowntree Foundation's** and **Fair Way Scotland's** documented evidence that the current system imposes "destitution by design."

[54] Ibid.
[55] COSLA (2025) Letter to the Chancellor of the Exchequer from COSLA President, Vice-President and Resources Spokesperson. 30 October. Available at: https://www.cosla.gov.uk/publications/25-10-30-letter-from-cosla-to-chancellor-of-the-exchequer (Accessed: 21 November 2025).
[56] Benton et al., 2021.

- The most recent **YouGov** polling on the issue which clearly evidenced public support for shorter routes, access to welfare benefits and political participation for migrants

By proceeding, the government rejects a coherent evidence base from its own committees, local government, academia, and the third sector, and intensifies a policy framework proven to cause profound harm.

2) How the New Earned Settlement Rules Could Works

A) Contemplating "Long-Term Contributions"

Volunteering is a valued and sizeable contribution, demonstrating commitment to local and regional communities. The leader of a local children's charity affirmed this:

"The more multicultural our volunteers are, the better understanding we can have of the people we are supporting. We are very proud of our multicultural referrals and of identifying the need."[57]

"We're getting more and more African volunteers, largely coming from the universities, and that's brilliant."[58]

However, we fundamentally oppose the 'earned settlement' concept, joining the Boaz Trust and a Praxis-led coalition of over 300 charities in condemning mandated volunteering as immoral and illogical. We reject pitting migrants against each other in a competition for the 'perfect migrant' status, which ignores the structural barriers that render volunteering impossible for many.

Expecting migrants with NRPF to volunteer, given the profound pressures documented, is impossibly naive A member of our lived experience group, who works full-time alongside her husband and takes care of three children, makes this clear:

"We work five days a week... are they expecting us to work seven days a week? Where do you get the time for that?".[59]

However, what is more troubling is the potential infection of financial logic to the concept of "earned settlement". Whilst we strongly refute the idea of mandated volunteering, we could begin to understand its appeal if we lived in a carte blanche world, where everyone had the time and money to allow for hours of weekly volunteering.

What we cannot accept in any form is the idea that financial contributions enable a quicker path to settlement, forming a two-tiered system based on one's economic health. At that point, the UK might

[57] No Recourse North East, 2025a
[58] Ibid.
[59] No Recourse North East, 2025b

open itself up to the murky world of citizenship-by-investment schemes and allow full rights only to the highest bidders.

Given the existing massive financial strain, adding further pressure to a ten-year route would undoubtedly intensify the documented harms. A member of our Lived Experience Group articulated this clearly:

"The concept of earned settlement as something new is ridiculous. We already have to earn it, and most people already work, pay tax, pay the health surcharge, go through the already existing immigration processes".[60]

The proposal's absurdity is stark in Shabana Mahmood's oral statement, which makes explicit that the extension is set to apply to migrants already on a settlement path.

"Everyone in the country today who has not already received indefinite leave to remain. This would mean that those who are due to reach settlement in the coming months and years would be subject to the new requirements for earned settlement, as soon as our immigration rules have changed."[61]

Thirty seconds later, she told those who had already secured settlement, many having completed the threatened 5-year route, are irrelevant to the proposal, citing

"Fairness is the most fundamental of British values. We made these people a promise when we gave them settlement. We welcomed them here permanently at that point, and we do not break our promises."[62]

This was delivered just minutes after detailing how those on a 5-year route to settlement, promised a half-decade waiting period, will have their path redrawn and see their promise broken, making a mockery of the claim that Britain values fairness above almost all else. Fundamentally, a system that does not even know how many people they are set to plunge into a heightened risk of destitution, poor physical health, poor mental health and barriers to work, is anything but fair.[63]

B) Exemptions

While we believe all should be exempt from these suffocating demands, we acknowledge a hierarchy of need.

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[60] Ibid.
[61] UK Parliament, 2025c. Migration Settlement Pathway. *Hansard*, House of Commons debates, 20 November. Available at: https://hansard.parliament.uk/commons/2025-11-20/debates/E3CE324D-7597-40C5-8697-DB48AA843CFC/MigrationSettlementPathway (Accessed: 25 November 2025).
[62] Ibid.
[63] Cuibus, 2025

Above all, subjecting single parents and domestic abuse survivors to these rules is perverse. A survivor in our Lived Experience Group made the case for exemption:

"I came to the UK legally and was contributing normally, but when abuse happened, there was no safe route for me and my daughter. The system needs a clear, protective pathway for survivors so we can rebuild our lives, work, and contribute without years of fear and uncertainty."[64]

Furthermore, expecting disabled members of society to volunteer in spaces that can be largely inaccessible is cruel. We also believe that migrants facing destitution should be exempt from the time pressures of mandated volunteering. Whilst we view volunteering as an excellent means of skill development and a way to meet potential employers, strong-arming individuals into volunteering is likely to take time away from their employment search.

Conclusions

The ten-year settlement proposal is a fundamentally flawed policy. It would systematically deepen destitution, exacerbate health crises, and entrench the failures of local support systems. It flagrantly disregards the evidence, intensifying a system that hinders integration, wastes potential, and burdens authorities and employers. For the sake of community cohesion, economic prosperity, and basic human dignity, this damaging proposal must be reworked or ideally, rubbished.

[64] No Recourse North East, 2025b